

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	
	§	
<b>Shao C. Hu</b>	§	<b>CASE NO. 14-36673-H4-13</b>
	§	
<b>DEBTOR</b>	§	

**DEBTOR'S RESPONSE TO**  
**GRYN CORPORATION'S MOTION TO REVOKE DEBTOR'S**  
**CONFIRMATION ORDER PURSUANT TO 11 U.S.C. §1330**  
(Docket No. 34)

COMES NOW **Shao C. Hu** ("Debtor"), and files this Response to *GRYN Corporation's Motion to Revoke Debtor's Confirmation Order Pursuant to 11 U.S.C. §1330* (the "Motion") and would show the Court the following:

**Admissions and Denials**

1. Debtor admits the allegations in the following paragraph(s) of the Motion: 1, 2, 3, 4, 5, 6b, 7, 8, and 9.
2. Debtor does not have sufficient information to admit or deny the allegations in the following paragraph(s) of the Motion: 6a.
3. The following paragraph(s) serves to identify parties or characterizes the nature of the claims and relief sought to which no response is required: 10, 11, and 12.

**Request to Abate Hearing on the Motion**

4. Debtor respectfully requests that the Court abate any hearing on the Motion for at least forty-five days to allow Debtor to conduct discovery based on the allegations set forth in the Motion.
5. Contemporaneously with the filing of this Response, Debtor has served a *First Set*

*of Discovery Requests* upon Movant's counsel which include *First Set of Interrogatories* and *First Requests for Production* to ascertain the factual bases for the allegations in the Motion.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court deny the Motion and grant further any relief to which Debtor shall be justly entitled.

Respectfully submitted,

**THE SUGHRUE LAW FIRM, PLLC**

/s/ Jason D. Laas-Sughrue

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Attorneys for Debtor(s)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following parties, and on the attached list, if any, by first-class mail or by electronic service via the Court's ECF filing system on 04/02/2015:

US Trustee via Electronic Service

US Trustee

Office of the U.S. Trustee

515 Rusk Avenue, Suite 3516

Houston, Texas 77002

Trustee via Electronic Service

David G. Peake

Chapter 13 Trustee

9660 Hillcroft Street, Suite 430

Houston, TX 77096-3860

Debtor via First-Class Mail

Shao C. Hu

9215 Woodwind Lakes Dr.

Houston, TX 77040

Movant's Counsel Via Electronic Service

/s/ Jason D. Laas-Sughrue

Jason D. Laas-Sughrue